

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

RAMIRO GONZALES,	§	CIVIL ACTION NO.
Plaintiff,	§	4:21-cv-828
	§	
	§	
vs.	§	JUDGE CHARLES ESKRIDGE
	§	
	§	
BRYAN COLLIER, <i>et</i>	§	
<i>al.</i> ,	§	
Defendants.		

TRIAL WITNESS LIST OF PLAINTIFF

No.	WITNESS NAME	WITNESS ADDRESS
1.	Ramiro Gonzales	TDCJ-Polunsky Unit 3872 FM 350 Livingston, TX 77351
	<p>Mr. Gonzales will testify live as a fact witness.</p> <p>Mr. Gonzales is a death-row inmate and the plaintiff in this case. He will testify as to the sincerity of his religious beliefs. He will also testify regarding the spiritual significance of to him of his requested accommodation in the execution chamber.</p>	
2.	Mark J. S. Heath, M.D.	Department of Anesthesiology Columbia University 622 W. 168th St. New York, NY 10032
	<p>Dr. Heath will testify live as an expert witness.</p> <p>Dr. Heath is an anesthesiologist with extensive publication and experience regarding lethal injection. He will testify regarding the risks that may exist to an IV line; how those risks are typically mitigated; and what risks holding someone's hand during the lethal injection will pose. He will testify regarding</p>	

	the substance of his report and supplement report that were served and filed.
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Dated this 29th day of June, 2022.

Respectfully submitted,

JASON D. HAWKINS
Federal Public Defender

/s/ Jeremy Schepers
Jeremy Schepers (TX 24084578)
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COUNSEL FOR PLAINTIFF GONZALES

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2022, a true and correct copy of the foregoing document was filed in the CM/ECF system, which will serve Leah O'Leary, counsel for the Defendants, at leah.oleary@oag.texas.gov.

/s/ *Jeremy Schepers*
Jeremy Schepers